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-U.S. EPA REGION 2 REPP -

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FACSIMILE REQUEST AND COVER SHEET



U.S. Environmental Protection Agency
Region 2
2890 Woodbridge Avenue
Edison, New Jersey 08837

TO: J. A. Timothy Francisco
OFFICE: Oxford Environmental
PHONE:
FAX: (201) 244-0722

FROM: Eric Wilson
OFFICE: Removal Action Branch
PHONE: (908) 906-6991
FAX: (908) 906-6182
DATE: June 11, 1997
SUBJECT: Cornell-Dubilier Electronics Site

Number of Pages (including cover sheet): 4

Message: Enclosed are EPA's modification to the SOP submitted for the removal action at the Cornell-Dubilier Electronics Site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
EDISON, NEW JERSEY 08837

By Facsimile and Regular US Mail

June 11, 1997

Mr. J. A. Timothy Francisco
Oxford Environmental, Inc.
43 Route 46 East, Suite 702
Pine Brook, NJ 07058

Re: Cornell-Dubilier Electronics Site
Administrative Order II-CERCLA-97-109

I have reviewed the Site Operations Plan (SOP), for the above referenced Site dated June 6, 1997. EPA approves of the SOP with the following modifications:

Specific Comments

p. 2

Sec. 1.3 EPA will be notified of contractors and subcontractors selected to perform the work specified pursuant to the Administrative Consent Order for this Site at the time contracts are awarded.

p. 3

Sec. 1.4 The Facility Coordinator will be responsible for notifying tenants of Hamilton Industrial Park of the work to be conducted at the site and the associated hazards.

p. 4

Sec. 1.6 The Operation and Maintenance checklist shall be incorporated in the SOP.

p. 4

Sec. 1.8 Sediment barriers will be maintained for a minimum of 1 year and until permanent vegetation is established.

p. 6

Sec. 1.11 Fence will be installed to connect the existing fenced area previously used by Pepe Driving School to the perimeter fence to restrict access to the southeast portion of Block 256 Lot 1 (sheet 3). Gates to restricted access areas will remain locked except when access is required for investigation or remediation of the site or operation and maintenance of systems installed as part of the removal action.

p. 6

Sec. 1.12 Warning signs will be placed approximately every 100 feet along the fence separating the northwest (occupied) portion of Block 256 Lot 1 from the southeast (unoccupied) portion of Block 256 Lot 1.

p. 27

Sec. 2.21.1 Due to proximity of work areas to occupied business and residences, dust controls measures will be implemented during all construction activities. If dust is observed migrating from work areas to neighboring residential or commercial areas or to occupied buildings within the industrial park, work will stop and dust control measures will be implemented. Work will continue upon satisfactory implementation of dust control measures.

p. 31

Sec. 2.24.5 Waste characterization shall include analysis for PCBs by USEPA SW846, Method 8080.

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Sec. 2.27 In the event of accidental spillage, the spill response procedures shall be initiated by on-site personnel if this can be done safely.

p. 34

Sec. 2.29 The Site Safety Officer shall be notified of any on-site emergencies and shall be responsible for ensuring that the appropriate procedures are followed.

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Sec. 2.29.2 If the cause of the injury or loss of the injured person does not affect the performance of site personnel, operations may continue, with on-site EMT initiating the appropriate first-aid and necessary follow-up as stated above.

General Comments

1) The work plan is appended to include the following text:

A Site Summary Report will be submitted to EPA which will include the following components:

- a synopsis of the work performed;
- identification and description of EPA-approved modifications to the SOP
- a list of all contractors and subcontractors used;
- a list of quantities, types and ultimate destination of materials removed from site for treatment or disposal; and
- a summary of actual costs incurred.

2) All references to Site Manager or Project Leader in the HASP shall be understood to mean the Facility Coordinator or his designee.

- 3) All references to project leader within the HASP shall be understood to mean the contractors supervisor.

These modification to the SOP are made unilaterally by EPA in accordance with Section VIII B of the above referenced Order. The SOP as modified is final and effective as of the date of this notice. If you have any questions regarding this notice or the modifications to the SOP, please call me at (908) 906-6991.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Wilson', with a long horizontal stroke extending to the right.

Eric Wilson
On-Scene Coordinator

- install chain link fence

install 74.18
chain link
fence

PROVIDE 4" PVC (SCHD 80) DRAIN PIPING
UNDER ROADWAY FOR SUMP LINE DISCHARGE

| DATE | PAVIN G | STORM SEWE RS | CURBS | CHAIN LINK FENCE | SNOW FENCE | SEED D AREAS | WARNI NG SIGNS | RIP RAP | SILT FENCE | SEDIM ENT BARRI ERS | CONDITIONS | ACTION REQUIRED | REPAIRS ORDERED | REMARKS | INSPECTED BY | REVIEWED |
|------|------------|---------------------|-------|------------------------|---------------|--------------------|----------------------|------------|---------------|------------------------------|------------|-----------------|-----------------|---------|--------------|----------|
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
| | NO | NO | NO | NO | NO | NO | NO | NO | NO | NO | | | | | | |
| 1/1 | YO | YO | YO | YO | YO | YO | YO | YO | YO | YO | | | | | | |
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